



November 14, 1997

Mr. Larry Dolosic, Vice President American National Bank & Trust Company of Chicago 900 75th Street, Willowbrook, Illinois 60521 ATTACHMENT 2

Dear Mr. Dolosic:

Attached is a copy of the Phase I Environmental Assessment for the property known as 2333 Wisconsin Avenue, Downers Grove, DuPage County, Illinois. We have personally inspected the property, reviewed records and interviewed knowledgeable people concerning this site. On the basis of observations, record searches and interviews, a Phase II study is recommended for this site.

The subject site was occupied by Liberty Copper & Wire Company, a manufacturer of copper electrical wire from 1960-1986. Liberty Copper was a TSD (transport, storage and disposal) site which went through storage closure for an outdoor waste storage area at the west side of the building and an indoor dock drum storage area at the northeast portion of the building (two out of the four specific areas of concern identified in this report). The subject site was also put on the CERCLIS list as a result of the TSD status.

A 1993 Preliminary Assessment conducted for the USEPA regarding the subject site did not indicate that further soil sampling was necessary for the indoor storage area, although it did not recognize any remedial work done on the site. The Preliminary assessment report recommended possible further closure issues although in reality those issues identified had already been addressed.

The following findings and associated recommendations have been made for this site:

• It is recommended that borings be conducted in the building (1990 addition) to a depth of 16 feet to determine if xylene contamination still exists on the property as a result of the

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former outside drum storage area. The former outdoor waste storage area was located on the west side of the property (where the current 1990 building addition is located). 55 gailon drums of waste xylene and other chemicals were stored outside; cracks were noted on the concrete pad. As part of obtaining RCRA closure for the site, soil sampling was conducted in four areas of concern. Soil sampling confirmed that 57,100 ppm of xylene contamination existed in this area. It does not appear that sampling was conducted below two feet. It is recommended that the site be further characterized. Approximately 140 cubic yards of soil were removed (to a depth of two feet) in and around the former waste storage area in July, 1987, confirmatory sampling in and around the excavated area did not indicate the depth of which the confirmatory sampling was conducted. The area was filled in with gravel on October, 1987.

- It is recommended that soil borings be taken through the concrete flooring in the northeast portion of the subject building where drum storage of waste xylenes and waste enamels was located. This area was described as being the 675 square feet of space in the front dock area. This area stored waste enamels and waste solvents prior to being shipped offsite to a fuel reblending site. As part of RCRA closure for the site, a chip sample of the concrete floor was taken. Elevated levels of xylene and nickel were detected in the chip sample. The floors were decontaminated and power washed and confirmatory samples did not indicate contamination. An internal memo at the Illinois EPA indicated that photographs indicated staining in this dock area, as well as cracking and a drain which could possibly (according to an Magnetek (successor to Liberty Copper and Wire) memo) be a dry well. No samples underneath the concrete were taken. Regardless of whether the drain is a drywell or floor drain, sampling is recommended.
- It is recommended that samples be taken in the basement area where collection tanks were located and drainage from the upper hazardous material storage area may have drained to. During the site inspection, the basement walls and ceilings were observed be coated with possible metal deposits. It appears that aboveground basement tanks were located in this area which were used to store electroplating waste. It is unclear what other operations

took place in the basement; however, sampling of the deposits on the walls and ceiling would confirm if metals contamination is present. A sample of soil under the basement floor is also recommended. A sump pump located in the northeast corner of the basement may be a potential pathway for contaminants to travel to the soil.

An electromagnetic scan of the subject site is recommended in order to determine if any remaining tanks are located on the subject site. The electromagnetic scan will indicate remaining tanks on the property as well as the former locations of tanks that have been removed. If tanks are still present, they should be removed if possible. Soil borings are recommended to determine if the tanks have leaked product. The subject site has four active underground storage tanks listed with the State Fire Marshal's Office. According to a map in an Illinois EPA file, three of the tanks are: two-4,000 gallon tanks and one-5,000 gallon tank in the western parking lot. However, building permits from the City of Downers Grove indicated that one-6,000 gallon tank and two-5,000 gallon tanks were on the subject site. The fourth tank has not been identified in any documents except the Fire Marshal registration list. There is no documentation for the removal of the four tank listed to the site, although the current owner, Mr. John Sorenson, recalls two tanks being removed from the parking lot when his company was located across the street from this subject building. If the tanks have been properly removed with permits from the Office of the State Fire Marshal, filing of appropriate documentation to change the status to closed is recommended. A heating oil tank may be the possible fourth registered tank; however, a heating oil tank, at the time of the tanks' registration, would not have to be registered. An FOI request with the State Fire Marshal's Office was filed and we are awaiting a response to the request. As soon as any information is gathered, it will be forwarded to you. The Downers Grove Fire Department did not indicate any records in their office for the subject site.

There is one nearby LUST site across Wisconsin Avenue (which is the same owner as the subject building) has received closure with the Illinois EPA and should not pose a threat to the subject site. There are a number of hazardous waste generators, two TRI reporters, two CERCLIS sites

(which has des the subject site), and two NIPC solid waste site in the vicinity of the subject site, including a simmediately adjacent site that use large quantities of chlorisms. The site immediately to the east could pose a significant threat to the subject property. It is recommended that sampling conducted at the subject site include VOCs, to determine if the use of tetrachloroethylene on the adjacent site is adversely impacting the subject site.

The property may fall under the provisions of the Illinois Responsible Property Transfer Act, if a transfer is made. From the field inspections and interviews with knowledgeable persons, underground tanks subject to registration at the State Fire Marshal's Office may be present. However, hazardous materials are not currently used in quantities which would be subject to reporting under SARA Section 312. The subject site is not within a floodway, or designated floodplain.

True copies of this report are signed and sealed on this page and on page 32 of the report.

Sincerely,

Kerri L. Weihofen

William W. Frerichs, REPA

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